

From: [Rosekrans, Carter](#)
To: [Hess, Jared N](#); [McPherson, Michael](#)
Cc: [Vance, Shayda](#); [FSIA-LR](#)
Bcc: [033585 00001 Venezuelan Debt Litigation CAR Email](#)
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela
Date: Wednesday, January 19, 2022 12:52:40 PM
Attachments: [image001.png](#)

Jared & Mike:

Hope you both had a good holiday season; has any progress been made with respect to the logistics for delivery of the service packet to Venezuela? We are facing another deadline of next Friday the 27th to update the Court on the status of service. Any bit of information that we could pass along is helpful and much appreciated.

Thanks,
Carter

From: Rosekrans, Carter
Sent: Wednesday, December 22, 2021 8:43 AM
To: Hess, Jared N <HessJN@state.gov>; McPherson, Michael <McPhersonMC@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Great, thank you Jared. We have a status update deadline from the Court of next Monday the 27th and will go ahead and inform the Court that delivery logistics are being finalized. If there's anything further to add before Monday, please do let us know.

Again, thanks so much, and have a happy and restful holiday season.

Best,
Carter

From: Hess, Jared N <HessJN@state.gov>
Sent: Tuesday, December 21, 2021 4:34 PM
To: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; McPherson, Michael <McPhersonMC@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Hi Carter,

Mike is currently out, but the check was received, and I learned this morning that it has been deposited. Now we're working with our colleagues to finalize logistics for delivery.

Best,

Jared N. Hess

Attorney Adviser

U.S. Department of State

L/CA/POG/GC

Email: HessJN@state.gov

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>

Sent: Tuesday, December 21, 2021 11:50 AM

To: McPherson, Michael <McPhersonMC@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>; Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Thanks, Mike. Has the replacement check arrived in your office yet? I believe it would have been delivered by now.

Thanks and have a good holiday season,

Carter

Carter Rosekrans | Associate

He/Him

Hughes Hubbard & Reed LLP

1775 I Street, N.W., 6th floor | Washington | DC 20006-2401

Office +1 (202) 741-4944 | Cell +1 (517) 862-3092

Carter.Rosekrans@hugheshubbard.com | [bio](#)

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From: McPherson, Michael <McPhersonMC@state.gov>

Sent: Thursday, December 9, 2021 8:21 AM

To: Smith, Lynette <Lynette.Smith@hugheshubbard.com>; Hess, Jared N <HessJN@state.gov>; Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Yes we will confirm receipt once we receive it.

Best,
Mike

From: Smith, Lynette <Lynette.Smith@hugheshubbard.com>
Sent: Wednesday, December 8, 2021 2:51 PM
To: McPherson, Michael <McPhersonMC@state.gov>; Hess, Jared N <HessJN@state.gov>; Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Mike:

Today we sent the replacement check to the address below via regular mail as instructed. Will you be able to confirm receipt when this arrives at your office?

Regards,
Lynette

Lynette Smith | Accounts Payable Specialist

Hughes Hubbard & Reed LLP

One Battery Park Plaza, 15th floor | New York | NY 10004-1482
Office +1 (212) 837-6340 | Cell | Fax +1 (212) 299-6340
Lynette.Smith@hugheshubbard.com

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From: McPherson, Michael <McPhersonMC@state.gov>
Sent: Wednesday, December 1, 2021 1:27 PM
To: Hess, Jared N <HessJN@state.gov>; Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

I've placed the check in the mail to be mailed out today.

Best,
Mike

From: Hess, Jared N <HessJN@state.gov>
Sent: Wednesday, December 1, 2021 12:25 PM
To: 'Rosekrans, Carter' <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>; McPherson, Michael <McPhersonMC@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Now with Mike. Thanks.

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>
Sent: Wednesday, December 1, 2021 12:20 PM
To: Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Jared:

Thanks so much for the quick response. I do not see an additional email address for Mike, but we are happy to coordinate with him or anybody else to arrange for the return of the expired check.

Thanks,
Carter

Carter Rosekrans | Associate
He/Him

Hughes Hubbard & Reed LLP
1775 I Street, N.W., 6th floor | Washington | DC 20006-2401
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From: Hess, Jared N <HessJN@state.gov>

Sent: Wednesday, December 1, 2021 12:13 PM

To: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>

Subject: Re: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Good Afternoon Carter,

Thank you for the note and I'm adding my colleague Mike McPherson for his awareness. We'll have the check returned to you shortly, and let you know once it's on its way.

Best,

Jared

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>

Sent: Wednesday, December 1, 2021 12:07 PM

To: Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Smith, Lynette <Lynette.Smith@hugheshubbard.com>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Jared:

Thank you very much for the update. We will require the return of the expired check before we may issue a replacement, which we will do in short order via mail to the address you have listed below after we receive the expired check. The expired check should be returned to the following address either by mail or courier:

Hughes Hubbard & Reed LLP
c/o Lynette Smith
Floor 15
One Battery Park Plaza
New York, NY 10004-1482

When you are able to send out the expired check, please do let us know to give us an idea of when to expect it. If there is any other information I need to provide or if you have any questions, do not hesitate to email or call me. Again, thanks so much,

Carter

Carter Rosekrans | Associate

He/Him

Hughes Hubbard & Reed LLP

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Carter.Rosekrans@hugheshubbard.com | [bio](#)

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From: Hess, Jared N <HessJN@state.gov>

Sent: Monday, November 29, 2021 5:03 PM

To: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Good Afternoon Carter,

I wanted to provide you with a quick status update. The administrative steps to transmit have largely been completed and we are finally in the process of arranging physical delivery through diplomatic channels. However, we noticed that the check in this case would not be accepted due to the date of the check. So we will need a replacement cashier's check and once it has been deposited, we expect the documents will be served. If you require the expired check to be returned before a new one can be issued, please let us know and we can return it to you immediately. Alternatively, you can have the replacement check mailed to us or we may be able to coordinate in person receipt/delivery (e.g. via courier). If you choose to mail it to us, please use the following mailing address:

U.S. Department of State
L/CA/POG/GC
2201 C Street, NW
SA-17, 10th Floor
Washington, DC 20522-1710
Attn: FSIA

If you'd like to try and coordinate an in-person delivery, we'd need advance notice of the expected date to ensure we'll have personal physically present at our offices located at 600 19th St. NW, Washington, DC 20431.

Happy to have a quick chat if you have any questions or would like to discuss.

Best,



Jared N. Hess

Attorney Adviser

U.S. Department of State

L/CA/POG/GC

Email: HessJN@state.gov

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>

Sent: Monday, November 8, 2021 11:15 AM

To: Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Jared:

Our deadline to update the Court is this Friday the 12th. If there have been any updates on service, they would be most welcome. Again, thanks for your help.

Regards,

Carter

Carter Rosekrans | Associate

He/Him

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From: Rosekrans, Carter

Sent: Monday, November 1, 2021 10:10 AM

To: Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>

Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>

Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Jared:

Thanks for this update. The Court has requested that we provide another update by next Friday, November the 12th. Is service still in process? For reference, the case is *Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela*, no. 1:21-cv-02678-AT, currently pending in the Southern District of New York.

Any status updates you might have are welcome and appreciated. Thanks so much.

Regards,
Carter

From: Hess, Jared N <HessJN@state.gov>
Sent: Wednesday, September 22, 2021 5:05 PM
To: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>; FSIA-LR <FSIA-LR@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>; Brady, Juliette D <BradyJD@state.gov>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Hi Carter,
Thanks for the email, I'm following up on the status with colleagues, but at the moment I understand it is still in process and it has not yet been served.

Best,

Jared N. Hess
Attorney Adviser
U.S. Department of State
L/CA/POG/GC
Email: HessJN@state.gov

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>
Sent: Wednesday, September 22, 2021 11:33 AM
To: FSIA-LR <FSIA-LR@state.gov>
Cc: Hess, Jared N <HessJN@state.gov>; Vance, Shayda <shayda.vance@hugheshubbard.com>; Brady, Juliette D <BradyJD@state.gov>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Hello:

Are there any further updates on the status of service pursuant to FSIA § 1608(a)(4) in the *Syracuse Mountains Corp.* matter (SDNY case no. 1:21-cv-02678-AT), for which we represent the Plaintiff?

The Court's deadline for us to provide an additional update is next Monday, September 27th, and

any information you may have would be helpful for our impending filing.

Regards,
Carter

Carter Rosekrans | Associate
He/Him

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Carter.Rosekrans@hugheshubbard.com | [bio](#)

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From: Rosekrans, Carter
Sent: Tuesday, September 14, 2021 2:03 PM
To: FSIA-LR <FSIA-LR@state.gov>
Cc: Hess, Jared N <HessJN@state.gov>; Vance, Shayda <shayda.vance@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Jared et al.:

Do you have any updates on the status of service pursuant to FSIA § 1608(a)(4) in the *Syracuse Mountains Corp.* matter (SDNY case no. 1:21-cv-02678-AT)? The Court has requested that we provide her an update by the Monday following next, September the 27th. Any additional information that you can provide would be helpful. Once again, thanks so much for your assistance.

Carter

From: Rosekrans, Carter
Sent: Tuesday, August 10, 2021 2:15 PM
To: Hess, Jared N <HessJN@state.gov>; FSIA-LR <FSIA-LR@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Mr. Hess:

Your message is received, with many thanks. We plan to file a letter to update the Court later this week, and we will follow up with you pursuant to any extended schedule that we may receive from the Court. We appreciate your attention to the matter, and would be grateful for any further

updates as you are able to provide them. Do not hesitate to contact me via email or at the telephone number listed in my email signature if need be.

Regards,
Carter

From: Hess, Jared N <HessJN@state.gov>
Sent: Tuesday, August 10, 2021 1:08 PM
To: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>
Cc: FSIA-LR <FSIA-LR@state.gov>; Vance, Shayda <shayda.vance@hugheshubbard.com>
Subject: RE: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

CAUTION: This email was sent by someone outside of the Firm.

Good Afternoon Carter,

My colleagues forwarded your correspondence regarding service in the *Syracuse Mountains Corp.* matter pursuant to the FSIA. Please feel free to reach out to FSIA-LR@state.gov and CC me should you have any questions in the future or wish for a status update in the case. I can confirm the Department received the request, and it is being processed for service through diplomatic channels, but at the moment it has not yet been transmitted. Once that occurs, a certified copy of the diplomatic note will be returned to the clerk. Unfortunately, I don't have a precise timeline for when transmittal will occur because, as you correctly noted, the pandemic has had an impact on the handling of these requests. Nevertheless, I hope we will have some additional information in a couple of weeks. Again, should you have any other questions or need another status update, don't hesitate to contact us.

Best,



Jared N. Hess
Attorney Adviser
U.S. Department of State
L/CA/POG/GC
Email: HessJN@state.gov

From: Rosekrans, Carter <Carter.Rosekrans@hugheshubbard.com>
Sent: Friday, August 6, 2021 11:17 AM
To: Brady, Juliette D <BradyJD@state.gov>
Cc: Vance, Shayda <shayda.vance@hugheshubbard.com>
Subject: 1608(a)(4) Service Update: Syracuse Mountains v. Venezuela

Juliet:

Thanks so much for taking the time to speak with me earlier this morning; I had called and am emailing now to inquire about the status of our attempted service on a foreign state pursuant to § 1608(a)(4) of the Foreign Sovereign Immunities Act. We represent plaintiff in the following case currently pending before Judge Analisa Torres in U.S. District Court for the Southern District of New York: *Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela*, case no. 1:21-cv-02678-AT.

We prepared the necessary materials for service back in May, and the Clerk of the Court mailed those materials to the Office of Policy Review and Inter-Agency Liaison at the Department of State then. For your convenience, I've attached two docket items from the case: the Clerk of the Court's certificate of mailing from May 21, as well as our most recent status update on service from June 14 endorsed by Judge Torres. Additionally, FedEx delivery information is linked [here](#), confirming successful receipt by "N. Blackshear" at the Department of State of the Clerk of the Court's mailed service packet.

We understand that the pandemic has slowed things down; we have a deadline to update the Court on the status of service by next Friday, August 14, so any additional information you may have would be appreciated. Don't hesitate to reach out to me by email or phone (listed below) with any questions or updates. Thanks so much!

Carter

Carter Rosekrans | Associate
He/Him

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